

## London Tenants Federation – 2571

### Written submission - Strategic and Local Regeneration – M15

*Would the Plan be effective in ensuring that development contributes positively to regeneration where it is needed and the building of strong inclusive communities in accordance with Policy GG1?*

- (a) In particular would figure 2.19 provide an effective and justified strategic framework for the identification of regeneration areas in local plans and neighbourhood plans?*
- (b) Would Policy SD10 provide an effective and justified strategic framework for the preparation of (i) policies in local plans and neighbourhood plans and (ii) regeneration strategies and programmes?*

Policy SD10 is based on what is described as ‘tackling spatial inequalities’ rather than on directly addressing poverty and the causes of poverty in some parts of London. The impact of doing this is to spread poverty out into less concentrated areas. This often results in displacement and appropriation of previously low-income working-class areas / social housing estates - to develop homes and jobs for the benefit of wealthier communities.

Estate regeneration / demolition schemes such as the Heygate Estate in Southwark and West Hendon Estate in Barnet, provide strong evidence of this.

There is a complete lack of evidence that applying a strategy of ‘tackling spatial inequalities’ (which in previous London Plans has also been described as developing mixed and balanced communities – particularly focused on changing tenure in areas with high levels of social rented homes) provides benefit for low income households. A number of government reports relating to this strategy (some examples set out below) makes this clear. Some academic analysis and much grass roots evidence suggests negative impact.

The policy is therefore unjustified and ineffective, certainly if the aim is to improve the life changes of low-income households.

- **‘Learning lessons from mixed and balanced communities’ March 2009** concludes - *“While mixed communities are likely to have higher average employment rates than mono-tenure social rented estates or places with low incomes, researchers have found little evidence that the employment prospects of unemployed or economically inactive residents have been improved by living in mixed communities, either in cases where existing areas have been altered and new populations added, or where they are living in places that were already mixed. Other factors, such as individual skills or education, or the nature of local labour markets, seem much more important.”*

This document highlights the ‘evidence gaps’ (i) *impacts on the original or indigenous population*: - most reported change focus on neighbourhoods rather than segments of the neighbourhood population; there is little robust evidence therefore (and virtually none from the UK) about the practical consequences for the original population. (ii) *What happens to non-returners?* There has been little work to track the destinations or fortunes of those who leave. Since they were in neighbourhoods previously characterised by concentrations of cheap and in particular social housing, it is at least

plausible to assume they have moved to neighbourhoods of simply low-cost tenures and therefore comparable levels of deprivation. (iii) *does the accommodation mix matter in creating sustainable communities?* ‘A mix of accommodation types as well as income and tenure are often advocated, as part of the strategy of building sustainable mixed communities: the rationale is that this offers housing choice that enables residents to remain in the same area as their housing needs change throughout their lifetime. But commercial logic (as well as local housing markets) means that in a number of cases owner-occupied accommodation in the mixed communities will be predominantly one- and two-bedroom apartments and not attractive to families – reflecting developers’ assessment of the market. This is another area where evidence about the consequences is limited’.

- **Tenure and change in deprived areas – evidence from the New Deal for Communities areas – Feb 2010** states – ‘Living in an area with large concentrations of social housing is unlikely to change your life chances per se. The analysis would seem to suggest it is the type of marginalised individuals in social housing that face the most serious barriers to work and this is not likely to be very different whether they live in an area where the majority of their neighbours are in the same situation or not. Their life chances will not improve solely by living next door to an owner-occupier. Likewise, the owner occupier is likely to be better equipped in life than the social renter whether or not they live in an area of mixed or mono tenure. The evidence would seem to suggest that all the encouraging of mixed tenure will do is to dilute concentrations of worklessness in a particular area, not improve the life chances of the workless or disadvantaged individuals themselves.’
- **Mixed communities – Evidence Review – November 2010** says ‘There is substantial evidence that areas with more mixed social composition tend to be more popular, more satisfying to live in, and have better services than poorer areas. This provides a rationale for continued intervention in low income neighbourhoods on the grounds of social justice.

However, to date the evidence is limited that a neighbourhood has a large effect on individual outcomes, over and above individual and household factors.

There is limited evidence that the new resources that may come with higher income residents (e.g. shops) either materialise or are beneficial to people on low incomes.

- Academic **Paul Cheshire’s 2007 ‘Segregated Neighbourhoods and Mixed Communities’ (Joseph Rowntree Foundation / LSE)** provides evidence that moving wealthier residents into poorer areas results in increases in property prices and goods and services; actually, making life harder for less well-off residents.

His 2009 **Policies for Mixed Communities: Faith-based Displacement Activity?** provides a great deal more analysis of the history of the policy, segregation of communities in terms of income and analysis of schemes such as the US ‘Moving to Opportunity’ experiment set up in 1992 and others in UK, Canada and France.

His paper concludes: “That the disadvantaged are concentrated in poor neighbourhoods does not demonstrate that poor neighbourhoods are a cause of disadvantage. If that is the case, the conclusion for policy is to reduce income inequality in society, not build mixed neighbourhoods or improve the built environment in such neighbourhoods.

Mixed neighbourhood policies may divert attention from the need for effective income redistribution.”

We suggest that low-income households too often have policy done to them and that frequently, their voices are not heard. We propose the most effective way of regenerating and addressing poverty in parts of London is to support low income communities to develop their own strategies and plans to benefit their communities. In some instances, this may be through developing Neighbourhood Plans.

LTF, with Just Space, supported the residents of the Carpenters Estate in Newham who have had more than a decade of top-down proposals by Newham Council to demolish their estate. Initially this involved supporting them to develop a Community Plan and later a Neighbourhood Plan. We note that this example has been included as a good case study in the Mayor’s good practice guide on estate regeneration.

**We propose the following changes to policy SD10** to ensure this policy is sound and effective: Boroughs should:

- A
- 1) Identify Strategic Areas for Regeneration (see Figure 2.19) in Local Plans and develop policies that are based on ~~thorough understanding of the demographics of communities and their needs~~ the needs of local communities in low income areas as identified by those communities and with any proposed changes / interventions determined by them.
  - 2) Seek to identify Local Areas for Regeneration ~~taking into account local circumstances~~ as above.
- 2A is not needed** if the changes set out above are made.
- B
- 1) Development Plans, Opportunity Area Planning Frameworks and development proposals should contribute to regeneration by tackling ~~spatial~~ the economic, environmental, and social ~~inequalities~~ barriers that affect the lives of people in the area in a direct way, especially in Strategic and Local Areas of Regeneration.
  - 2) Actively support communities in Areas of Regeneration who wish to establish Neighbourhood Forums and develop Neighbourhood Plans.

Add

- D Monitor any direct benefits or negative impact to existing low-income households in regeneration areas through evidence based tracking of those households
- 2.10.3 This paragraph needs to be amended, after ‘stakeholders to ensure’ communities of ‘these areas benefit from’ social, economic and environmental improvements to meet their needs, as identified by them.

Penultimate sentence ‘*tackling spatial inequalities*’ should be removed.

Final sentence should be changed to: It is important that these are developed with existing communities in a bottom-up fashion. ~~through engagement with local communities.~~